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November 20, 2002

EX PARTE

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: WC Docket No. 02-314 – Application of Qwest
Communications International Inc. for
Authorization to Provide In-Region, InterLATA
Service in the States of Colorado, Idaho, Iowa,
Montana, Nebraska, North Dakota, Utah,
Washington and Wyoming**

Dear Ms. Dortch:

Qwest Communications International Inc. (“Qwest”) submits this filing at the request of Commission staff to clarify statements made in Qwest’s November 18, 2002, *ex parte* regarding mismatches between Pending Service Order Notifications (“PSOs”) and Local Service Requests (“LSRs”).¹

In its November 18 *ex parte*, Qwest explained the methodology it used to disprove Eschelon’s claim that Qwest commits errors on up to 40% of all manually handled LSRs. In doing so, Qwest explained that it compared the number of call center trouble tickets opened by Eschelon with the number of LSRs Eschelon electronically submitted to arrive at a PSO to LSR mismatch rate of 1.066%. As noted in the November 18 *ex parte*, Qwest calculated the number of LSRs electronically submitted by Eschelon using the denominators in PIDs PO-5A and PO-5B (specific to Eschelon).

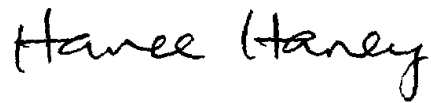
Commission staff has asked whether all of the orders represented in the denominators of PO-5A and PO-5B are subject to PSOs. PSO is a subscription-based service and CLECs must contact the Wholesale Systems Help Desk to subscribe. Once a CLEC subscribes, a PSO is generated each time a Firm Order Confirmation (“FOC”) is issued and when the service and

¹ See Qwest 11/18/02 Ex Parte, WC Docket No. 02-314, filed November 18, 2002.

equipment data and/or due date changes on the service order. Because Eschelon subscribes to PSON, all of the orders represented in the denominators of PO-5A and PO-5B that Qwest included in its November 18 *ex parte* were subject to PSONs.

The twenty-page limit does not apply to this filing.

Respectfully submitted,

A handwritten signature in black ink that reads "Hamee Haney". The signature is written in a cursive, slightly slanted style.

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